



Sent via CM/ECF

April 7, 2025

The Honorable Jessica G. L. Clarke
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1040
New York, New York 10007

MEMO ENDORSED

eShares, Inc. d/b/a Carta, Inc. v. Jerry O. Talton, III, 1:22-cv-10987

Dear Judge Clarke:

McAllister Olivarius represents Defendant/Counter-Plaintiff Jerry O. Talton, III (“Talton”) in the above referenced matter. We submit this letter on behalf of all parties pursuant to Sec. 2(e) of the Court’s Individual Rules and Practices in Civil Cases.

On March 27, 2025, the Court ruled on the Motion to Dismiss Talton’s Second Amended Counterclaim (“SACC”) filed by Plaintiff/Counter-Defendants eShares, Inc. d/b/a Carta, Inc. (“Carta”) and Henry Ward (“Ward”), and granted Carta permission to file its Third Amended Complaint (“TAC”) (ECF No. 152). Carta filed the TAC on March 28, 2025. The parties are actively engaged in discovery and have determined they require additional time to consider their respective answers. The parties have been in communication through counsel regarding their respective deadlines, and have agreed as follows:

- Talton does not oppose an extension of the deadline for Carta and Ward to file an Answer to the SACC from April 10, 2025, to April 25, 2025.
- Carta does not oppose an extension of the deadline for Talton to file an Answer to the TAC from April 11, 2025, to April 25, 2025.

Carta and Ward consent to this Letter and agree to the proposed deadlines. Talton has not previously sought an extension of time to file an Answer to the TAC. Carta and Ward have not previously sought an extension of time to file an Answer to the SACC. The parties are not currently scheduled to appear before the Court, and as such, granting these extensions will not impact any proceedings.

641 LEXINGTON AVENUE | 13TH FLOOR | NEW YORK, NY 10022 | USA | +1 (212) 433-3456 | MCOLAW.COM

THE PEARCE BUILDING | WEST STREET | MAIDENHEAD | SL6 1RL | ENGLAND | +44 (0)20 3048 5959 | DX 641 | MAIDENHEAD

Partners: **Dr Ann Olivarius** (Solicitor of England & Wales and Ireland; U.S. attorney licensed in MN, NH, VA, DC, ID & NY)
Dr JFO McAllister (Registered Foreign Lawyer and U.S. attorney licensed in NY & CT)

McALLISTER
OLIVARIUS

Accordingly, the parties respectfully request the Court enter an order extending the deadline for Talton to file an Answer to the TAC and Carta and Ward to file an Answer to the SACC to April 25, 2025.

Respectfully submitted,

/s/ Maura Abeln Smith

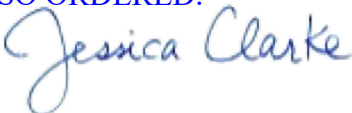
Maura A. Smith

Counsel for Defendant/Counter-Plaintiff
Jerry O. Talton III

cc: Counsel of Record [Via CM/ECF]

Application GRANTED. The parties' deadlines to file an answer to the SACC (Carta & Ward) and TAC (Talton) is extended as set forth above. The Clerk of Court is respectfully directed to terminate ECF No. 155.

SO ORDERED.



JESSICA G. L. CLARKE
United States District Judge

Dated: April 8, 2025
New York, New York